

BORIS FELDMAN, State Bar No. 128838  
 Email: boris.feldman@wsgr.com  
 ELIZABETH C. PETERSON, State Bar No. 194561  
 Email: epeterson@wsgr.com  
 CHERYL FOUNG, State Bar No. 108868  
 Email: cfoung@wsgr.com  
 DIANE M. WALTERS, State Bar No. 148136  
 Email: dwalters@wsgr.com  
 BRYSON S. SANTAGUIDA, State Bar No. 255173  
 Email: bsantaguida@wsgr.com  
 WILSON SONSINI GOODRICH & ROSATI  
 Professional Corporation  
 650 Page Mill Road  
 Palo Alto, CA 94304-1050  
 Telephone: (650) 493-9300  
 Facsimile: (650) 565-5100

*Attorneys for Defendants Larry Page, Sergey  
 Brin, Eric E. Schmidt, L. John Doerr, John L.  
 Hennessy, Paul S. Otellini, K. Ram Shriram,  
 Shirley M. Tilghman, Nikesh Arora, Patrick  
 Pichette, and Nominal Defendant Google Inc.*

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

In re GOOGLE INC. SHAREHOLDER  
 DERIVATIVE LITIGATION

This Document Relates To:

ALL ACTIONS

Master File No. CV-11-04248-PJH

**STIPULATION AND [PROPOSED]  
 ORDER REGARDING BRIEFING  
 SCHEDULE FOR DEFENDANTS'  
 RESPONSE TO COMPLAINT**

AS MODIFIED

DATE: N/A

TIME: N/A

JUDGE: Hon. Phyllis J. Hamilton

1 WHEREAS, on October 24, 2011, plaintiffs filed their Verified Consolidated  
2 Shareholder Derivative Complaint (the "Complaint");

3 WHEREAS, pursuant to the September 19, 2011 Stipulation and Order Consolidating  
4 Actions and Appointing Lead Counsel entered by the Court (Dkt. #15), Defendants have thirty  
5 days from the October 24, 2011 filing of the Complaint, or until November 23, 2011, to respond  
6 to the Complaint;

7 WHEREAS, due to intervening circumstances, including a death in the immediate family  
8 of one of Defendants' attorneys, Defendants have requested, subject to Court approval, that the  
9 deadline for Defendants to respond to the Complaint be extended until December 14, 2011, and  
10 plaintiffs have agreed to the requested extension;

11 WHEREAS, the parties have further agreed, subject to Court approval, that plaintiffs'  
12 opposition to Defendants' motion(s) to dismiss shall be filed no later than January 31, 2012, and  
13 Defendants' reply memoranda shall be filed no later than March 1, 2012;

14 WHEREAS, the requested extension is not for the purpose of delay and will not prejudice  
15 any party;

16 WHEREAS, the parties have further met and conferred regarding applicable page-length  
17 requirements and have agreed that in the event that Defendants file a consolidated motion in  
18 response to the Complaint, rather than multiple, individual motions, Defendants shall have the  
19 option to file a single, consolidated motion not to exceed 50 pages, in lieu of filing separate 25-  
20 page briefs;

21 WHEREAS, in the event that Defendants file a single, consolidated motion in response to  
22 the Complaint, Plaintiffs shall have the option of filing a single, consolidated opposition brief of  
23 equal length;

24 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the  
25 undersigned, subject to Court approval, as follows:

- 26 1. Defendants shall have until December 14, 2011 to respond to the Complaint;  
27 2. Plaintiffs shall have until January 31, 2012 to file their brief(s) in opposition to  
28 Defendants' motion(s) to dismiss;

3. Defendants shall have until March 1, 2012 to file their reply brief(s);

4. Defendants shall have the option to file a single, consolidated motion in response  
40  
to the Complaint not to exceed ~~50~~ pages, in lieu of filing separate 25-page briefs; and

5. In the event that Defendants file a single, consolidated motion, plaintiffs shall  
have the option of filing a single, consolidated opposition of equal length.

Dated: November 16, 2011

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
650 Page Mill Road  
Palo Alto, CA 94304-1050

By: /s/ Elizabeth C. Peterson  
Elizabeth C. Peterson

Attorneys for Defendants and Nominal  
Defendant Google Inc.

Dated: November 16, 2011

ROBBINS GELLER RUDMAN  
& DOWD LLP  
DARREN J. ROBBINS  
TRAVIS E. DOWNS III  
BENNY C. GOODMAN III  
ERIK W. LUEDEKE

By: /s/ Benny C. Goodman III  
Benny C. Goodman III

655 West Broadway, Suite 1900  
San Diego, CA 92101-3301  
Telephone: 619/231-1058  
619/231-7423 (fax)

ROBBINS GELLER RUDMAN  
& DOWD LLP  
SHAWN A. WILLIAMS  
Post Montgomery Center  
One Montgomery Street, Suite 1800  
San Francisco, CA 94104  
Telephone: 415/288-4545  
415/288-4534 (fax)

1 ROBBINS UMEDA LLP  
2 BRIAN J. ROBBINS  
3 FELIPE J. ARROYO  
4 SHANE P. SANDERS  
5 GINA STASSI  
6 600 B Street, Suite 1900  
7 San Diego, CA 92101  
8 Telephone: 619/525-3990  
9 619/525-3991 (fax)

10 POMERANTZ HAUDEK GROSSMAN  
11 & GROSS LLP  
12 MARC I. GROSS  
13 JEREMY A. LIEBERMAN  
14 JASON S. COWART  
15 FEI-LU QIAN  
16 100 Park Avenue  
17 New York, NY 10017-5516  
18 Telephone: 212/661-1100  
19 212/661-8665 (fax)

20 POMERANTZ HAUDEK GROSSMAN  
21 & GROSS LLP  
22 PATRICK V. DAHLSTROM  
23 Ten South La Salle Street, Suite 3505  
24 Chicago, IL 60603  
25 Telephone: 312/377-1181  
26 312/377-1184 (fax)

27 Lead Counsel for Plaintiffs

28  
*I, Elizabeth C. Peterson, am the ECF user whose ID and password are being used to file this  
STIPULATION AND [PROPOSED] ORDER REGARDING BRIEFING SCHEDULE FOR  
DEFENDANTS' RESPONSE TO COMPLAINT. In compliance with General Order 45, X.B., I  
hereby attest that Benny C. Goodman III has concurred in this filing.*

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 11/17/11

